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APPLICATION GRANTED

 4/14/2025
Hon. Katharine H. Parker, U.S.M.J.

VIA ECF

The Honorable Katharine H. Parker, U.S.M.J.
U.S. District Court, Southern District of New York
500 Pearl St.
New York, NY 10007

Re: Rene v. 31 East 21 Express Inc. et al.
Case No.: 21-cv-7435 (JGK) (KHP)

Dear Judge Parker:

We represent Plaintiff in this action. We write to respectfully request that the Court grant an additional one-week extension as to Plaintiff's deadline to move for a default judgment from April 11, 2025 until April 18, 2025 and the defaulting Defendants' deadline to respond from April 25, 2025 to May 2, 2025. This is the third request of this kind. The reason for this request is that Plaintiff needs additional time to review his submission with undersigned counsel before filing his motion with the Court. We therefore respectfully request that the Court extend the above-mentioned deadlines.

Thank you for your attention to the above.

Respectfully Submitted,

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Michael Taubenfeld